



CAPEZZA HILL, LLP  
ATTORNEYS AT LAW

Benjamin W. Hill, Esq.

Partner

February 6, 2020

*Via Hand Delivery*  
*Confidential and Filed Under Seal*

Hon. Christian Hummel  
James T. Foley Courthouse  
445 Broadway  
Albany, NY 12207

Re: *Special Master Request for Payment of Fees (1:18-cv-566)*

Dear Your Honor:

Enclosed for your review is an invoice for services rendered through January 31, 2020 in the above-captioned matter which is being submitted to you under seal per the Court's instruction.

If you have any questions or concerns, please do not hesitate to contact me.

Respectfully submitted,

**CAPEZZA HILL, PLLC**

By:

Benjamin W. Hill

Encs.

**Capezza Hill, LLP**  
 30 South Pearl Street  
 P-110  
 Albany, NY 12207  
 United States  
 518-478-6065



**Hon. Christian Hummell**

<b>Balance</b>	\$15,179.00
<b>Invoice #</b>	00036
<b>Invoice Date</b>	February 6, 2020
<b>Payment Terms</b>	
<b>Due Date</b>	

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**Special Master NRA v. Cuomo et al.**

**Time Entries**

Date	EE	Activity	Description	Rate	Hours	Line Total
12/03/2019	BH	Review/Analysis	Researhc and review doc review platforms/options	\$325.00	1.5	\$487.50
12/09/2019	BH	Review/Analysis	Review/analysis of Hummell 8.8.19 Order	\$325.00	1.2	\$390.00
12/09/2019	BH	Review/Analysis	Review docket and text orders.	\$325.00	0.2	\$65.00
12/19/2019	BH	Review	Review letter from Brewer to Court re special master contact	\$325.00	0.2	\$65.00
12/19/2019	BH	Phone Call	Call w/ Nicole at Hummell's chambers re status.	\$325.00	0.2	\$65.00
01/08/2020	BH	Draft	Research and draft memo re deliberate process privilege	\$325.00	1.0	\$325.00
01/09/2020	BH	Review/Analysis	Review docket and pleadings	\$325.00	1.0	\$325.00
01/09/2020	BH	Draft	Draft memo on privileges	\$325.00	1.0	\$325.00
01/09/2020	BH	Draft	Draft spreadsheet	\$325.00	0.4	\$130.00
01/09/2020	BH	Review/Analysis	Review text order re special master	\$325.00	0.1	\$32.50
01/09/2020	BH	Research	Research privilege issues	\$325.00	0.3	\$97.50
01/09/2020	BH	Review/Analysis	Review Scheindlin article re sp masters	\$325.00	0.2	\$65.00
01/10/2020	BH	Review/Analysis	Review of Amended Complaint and exhibits; memos re same.	\$325.00	2.3	\$747.50
01/12/2020	BH	Review/Analysis	Review and analyze transcript of mtd oral argument	\$325.00	1.0	\$325.00
01/13/2020	BH	Review/Analysis	Review and analysis of Order on first MTD Amended Complaint	\$325.00	2.0	\$650.00
01/13/2020	BH	Review/Analysis	Review and analysis of Order on Second MTD re selective enforcement claims etc.	\$325.00	0.5	\$162.50
01/13/2020	BH	Review/Analysis	Review and analysis of motion to compel and response	\$325.00	2.6	\$845.00

01/14/2020	BH	Review/Analysis	Review and analysis of motions to compel and for protective order	\$325.00	1.8	\$585.00
01/14/2020	BH	Review/Analysis	Review and analyze courts decision on vullo deposition	\$325.00	0.3	\$97.50
01/14/2020	BH	Review/Analysis	Review letter briefs re motion to amend	\$325.00	0.2	\$65.00
01/15/2020	BH	Review/Analysis	Review motion to file second amended complaint.	\$325.00	0.3	\$97.50
01/15/2020	BH	Correspondence	review letter from William Scott re special master.	\$325.00	0.1	\$32.50
01/16/2020	BH	Review/Analysis	Review caselaw -- children's first etc. re privileges.	\$325.00	1.4	\$455.00
01/16/2020	BH	Document Review	Doc Review of Gov docs	\$325.00	0.7	\$227.50
01/17/2020	BH	Review/Analysis	Document review gov's docs.	\$325.00	4.5	\$1,462.50
01/17/2020	BH	Review	Review exec chamber docs.	\$325.00	3.0	\$975.00
01/17/2020	BH	Phone Call	Phone call w/ Nicole in chambers re log, etc.	\$325.00	0.3	\$97.50
01/18/2020	BH	Review/Analysis	Research on privilege log; memo re prep for conf w/ judge.	\$325.00	1.0	\$325.00
01/21/2020	BH	Review/Analysis	Review CFF priv log	\$325.00	0.2	\$65.00
01/21/2020	BH	Review/Analysis	Review and analysis of Motion to compel subpoena papers	\$325.00	1.2	\$390.00
01/21/2020	BH	Research	Research on priv logs and privilege.	\$325.00	0.7	\$227.50
01/21/2020	BH	Research	Review and analysis of caselaw on atty-client privilege and deliberative process privilege	\$325.00	1.5	\$487.50
01/23/2020	BH	Review/Analysis	Review DFS docs	\$325.00	2.0	\$650.00
01/23/2020	BH	Phone Call	Prep for and call with chambers re privilege log, etc.	\$325.00	0.6	\$195.00
01/23/2020	BH	Phone Call	Call w/ chambers re conf.	\$325.00	0.1	\$32.50
01/23/2020	BH	Review/Analysis	Review corr and analysis of prior orders, draft letter to Judge Hummel	\$325.00	2.5	\$812.50
01/23/2020	BH	Review/Analysis	Review DFS docs and priv log	\$325.00	1.0	\$325.00
01/27/2020	BH	Review/Analysis	Review caselaw and orders re affidavit and privilege logs	\$325.00	3.5	\$1,137.50
01/27/2020	BH	Phone Call	Phone call w/ chambers re privilege logs	\$325.00	0.3	\$97.50
01/28/2020	BH	Draft	Review logs and documents, corr.	\$325.00	2.5	\$812.50
01/28/2020	BH	Edit	Edit letter to Court re status etc.	\$325.00	0.5	\$162.50

Totals: 45.9 \$14,917.50

## Expenses

Date	EE	Activity	Description	Cost	Quantity	Line Total
01/09/2020	BH	Copies	copies of pleadings	\$0.25	90.0	\$22.50
01/09/2020	BH	Copies	Copies of ECF docs oral argument tr.	\$0.25	50.0	\$12.50
01/09/2020	BH	Copies	Decision on MTD	\$0.25	71.0	\$17.75
01/13/2020	BH	Bulk Copying	Motions, pleadings, orders	\$0.25	389.0	\$97.25
01/17/2020	BH	Copies	gov documents	\$0.25	337.0	\$84.25
01/21/2020	BH	Copies	Copies of motion to compel subpoena papers	\$0.25	47.0	\$11.75

01/21/2020	BH	Copies	Westlaw sections on privilege	\$0.25	62.0	\$15.50
Expense Total:						\$261.50
Time Entry Sub-Total:						\$14,917.50
Expense Sub-Total:						\$261.50
Sub-Total:						\$15,179.00
Total:						\$15,179.00
Amount Paid:						\$0.00
Balance Due:						\$15,179.00